IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE, TENNESSEE

WORD MUSIC, LLC, a Tennessee Limited Liability Company, DAYSPRING MUSIC, LLC, a Tennessee Limited Liability Company, WORDSPRING MUSIC, LLC., a Tennessee Limited Liability Company, UNICHAPPELL MUSIC, INC., A Delaware Corporation, CHAPPELL & CO., INC., a Delaware Corporation, COTILLION MUSIC, INC., a Delaware Corporation, RIGHTSONG MUSIC, INC., a Delaware Corporation, WALDEN MUSIC, INC., a New York Corporation, WARNER/TAMERLANE PUBLISHING CORP., a California Corporation, and WB MUSIC CORP., a California Corporation,

Plaintiffs,

v.

PRIDDIS MUSIC, INC., a Nevada Corporation, RICHARD L. PRIDDIS, individually, PROSOUND KARAOKE LTD., a United Kingdom Corporation, MEDIOSTREAM, INC., a California Corporation, d/b/a "K SUPERSTAR," D.J. MILLER MUSIC DISTRIBUTORS, INC., a Colorado Corporation, d/b/a "PROSING," and DALE S. MILLER, Individually,

Defendants.

CIVIL ACTION NO. 3:07-cv-502

Judge Wiseman

JURY DEMAND

JOINT MOTION

Comes now Plaintiffs, Word Music, LLC, , Dayspring Music, LLC, Wordspring Music, LLC., Unichappell Music, Inc., Chappell & Co., Inc., Cotillion Music, Inc., Rightsong Music, Inc., Walden Music, Inc., Warner/Tamerlane Publishing Corp., WB Music Corp., and Defendant

Dockets.Justia.com

Mediostream, Inc., by and through undersigned counsel, and hereby respectfully requests leave to enter into an Agreed Order providing that Defendant Mediostream will deliver to the Wyoming offices of counsel for Plaintiffs their Rule 26(a)(1) disclosures no later than Friday, September 21, 2007. For cause, this Joint Motion is in lieu of the Plaintiffs filing a motion to compel; further, the parties would show the Court that the parties have previously entered into an agreement to mediate this dispute on October 12, 2007, and are working together toward that end. A proposed Agreed Order is attached hereto for the Court's consideration.

/s/ James C. Bradshaw III
James C. Bradshaw III, BPR 13170
WYATT, TARRANT & COMBS, LLP
2525 West End Avenue, Suite 1500
Nashville, Tennessee 37203
615.244.0020
Counsel for Defendant Mediostream, Inc.

/s/ Paul Harrison Stacey w/permission
Paul Harrison Stacey
Wy. Atty. No. 5-2615
Law Offices of Paul Harrison Stacey, P.C.
7225 North Spring Gulch Road
P.O. Box 4157
Jackson, Wyoming 83001
307.773.7333
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2007, a copy of the foregoing was filed in the above-captioned action. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, including:

Jeff T. Goodson
Law Offices of John Cobb Rochford, PLLC
2200 Abbot Martin Road, Suite 201
Nashville, TN 37215

Paul Harrison Stacey
Law Offices of Paul Harrison Stacey, P.C.
7225 North Spring Gulch Road
P.O. Box 4157
Jackson, Wyoming 83001
307.773.7333

Timothy L. Warnock, Esq.
Bowen, Riley, Warnock & Jacobson, PLC.
1906 West End Avenue
Nashville, TN 37203

Owen Borum
Caplan & Ernest, LLC
One Boulder Plaza
1800 Broadway, Suite 200
Boulder, CO 80302-6737

____/s/ James C. Bradshaw III______

45312695.1